Casse 4:111-cv-02753-85W Doocumeent 64 Filled 01/06/12 Page 110643 1 Theodore A. Griffinger, Jr. (SBN 66028) Tanya Herrera (SBN 177790) 2 STEIN & LUBIN LLP Transamerica Pyramid 3 600 Montgomery Street, 14th Floor San Francisco, ČA 94111 4 Telephone: (415) 981-0550 Facsimile: (415) 981-4343 5 tgriffinger@steinlubin.com therrera@steinlubin.com 6 Attorneys for Defendants, 7 JON SABES, STEVEN SABES AND MARVIN SIEGEL 8 9 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 10 11 SAN FRANCISCO DIVISION 12 Case No. 3:11-cv-02753-JSW 13 SUZANNE D. JACKSON. Plaintiff. STIPULATION AND [PROPOSED] 14 ORDER GRANTING LEAVE TO EXCEED PAGE LIMITS ESTABLISHED BY THE 15 v. COURT'S CIVIL STANDING ORDERS 16 WILLIAM FISCHER; JON SABES; STEVEN SABES; DAVID GOLDSTEEN; MARVIN SIEGEL; BRIAN CAMPION; 17 LONNIE BROOKBINDER; CHETAN NARSUDE; MANI KOOLASURIYA; 18 JOSHUA ROSEN; UPPER ORBIT, LLC; 19 SPECIGEN, INC.; PEER DREAMS INC.; NOTEBOOKZ INC.; ILEONARDO.COM 20 INC.; NEW MOON LLC; MONVIA LLC; and SAZANI BEACH HOTEL, 21 Defendants. 22 Plaintiff Suzanne Jackson and Defendants Jon Sabes, Steven Sabes and Marvin 23 Siegel (collectively "Defendants"), by and through their counsel, and subject to the Court's 24 approval, stipulate as follows: 25 WHEREAS, Plaintiff filed a First Amended Complaint ("FAC") on December 5, 26 2011; 27 WHEREAS, the FAC asserts purported federal securities fraud and common law 28

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STIPULATION AND [PROPOSED] ORDER GRANTING LEAVE TO EXCEED PAGE LIMITS
ESTABLISHED BY THE COURT'S CIVIL STANDING ORDERS

1	claims related to Plaintiffs' investments;
2	WHEREAS, the FAC alleges, inter alia, that Defendants engaged in a
3	comprehensive scheme to defraud Plaintiff in violation of the Securities Exchange Act of 1934
4	and the Securities Act of 1933 and by failing to provide and failing to disclose material facts,
5	which purportedly constitute common law fraud;
6	WHEREAS, the parties agree that the FAC's scope and complexity warrant a
7	modest increase in the page limits imposed by this Court's Civil Standing Orders for Defendants'
8	opening brief and Plaintiff's opposition brief to Defendants' motion to dismiss, but that the page
9	limit for Defendants' reply brief shall remain 15 pages;
10	NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY
11	AND BETWEEN THE PARTIES, subject to the Court's approval, that:
12	1. Defendants' memorandum of law in support of their motion to dismiss shall
13	not exceed 25 pages; and
14	2. Plaintiffs memorandum of law in opposition to Defendants' motion to
15	dismiss shall not exceed 25 pages.
16	Dated: January 6, 2011 KAUFMAN LLC
17	By: /s/Alan H. Kaufman
18	Alan H. Kaufman
19	Attorneys for Plaintiff Suzanne D. Jackson
20	Dated: January 6, 2011 STEIN & LUBIN LLP
21	By: /s/ Tanya Herrera
22	Tanya Herrera Attorneys for Defendants
23	Jon Sabes, Steven Sabes and Marvin Siegel
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1	[PROPOSED] ORDER
2	Having reviewed the above stipulation, IT IS HEREBY ORDERED that the page
3	limits for the motion to dismiss briefing in this matter shall be:
4	Defendants' motion to dismiss: 25 pages
5	Plaintiff's opposition to Defendants' motion to dismiss: 25 pages
6	
7	PURSUANT TO THE STIPULATION, IT IS SO ORDERED.
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9	011011
10	Dated: January 11, 2012
11	The Hong able Jeffrey S. White United States District Judge
12	By: CHIEF JUDGE JAMES WARE
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